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# Language Assistance Plan

July 2020

*Title VI of the Civil Rights Act of 1964*

*(42 U.S.C. §§ 2000d, et seq.)*

&

*FTA Circular 4702.1B, dated October 1, 2012*

TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT  
ADMINISTRATION RECIPIENTS

Montgomery County Department of Transportation

Division of Transit Services

Rockville, Maryland



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이 통지는 다른 언어에서 사용할 수 있는 만들 것 이다.

Thông báo này sẽ được thực hiện có sẵn trong các ngôn ngữ khác.

English

Spanish

Chinese

French

Korean

Vietnamese

Montgomery County Department of Transportation  
Division of Transit Services  
101 Monroe Street, 5th Floor  
Rockville, Maryland 20850



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# I. Background

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on Limited English Proficient (LEP) persons because such conduct constitutes national origin discrimination.

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” reprinted at 65 FR 50121, August 16, 2000 directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001 by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. Federal agencies were directed to provide guidance and technical assistance to recipients of Federal funds as to how they can provide meaningful access to Limited English Proficient users of Federal programs.

The U.S. DOT published revised guidance for its recipients on December 14, 2005. This document states that Title VI and its implementing regulations require that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP) and that recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The Federal Transit Administration (FTA) references the DOT LEP guidance in its Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” which was published on October 1, 2012. Chapter III, section 9 of this Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and requires that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of the DOT LEP Guidance.

The DOT LEP Guidance recommends that all recipients, especially those that serve large LEP populations, should develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP Guidance notes that effective implementation plans typically include the following five elements: 1) identifying LEP individuals who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and updating the plan.

Individuals, who have a limited ability to read, write, speak, or understand English are Limited English Proficient, or “LEP.” Transit agencies that provide language assistance to persons with Limited English Proficiency in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers and, ideally, will encourage riders to continue using the system after they are proficient in English and/or have more transportation options.

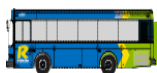


Catering to LEP persons may also help increase and retain ridership among the agency's broader immigrant communities in two important ways: 1) agencies that reach out to recent immigrant populations in order to conduct a needs assessment and prepare a language implementation plan (pursuant to the DOT LEP Guidance) will send a positive message to these persons that their business is valued; and 2) community outreach designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant and linguistically isolated populations and ensuring that an agency's transit routes, hours and days of service, and other service parameters are responsive to the needs of these populations. Additionally, transit agencies that conduct outreach to LEP persons can increase their potential for recruiting bilingual employees to better serve the needs of the community. In summary, serving the needs of LEP persons is not only a good business decision; it fulfills the mission of the transit agency to serve the public.

Montgomery County is a very diverse county with more than 39 different languages spoken. The Montgomery County Department of Transportation (MCDOT) supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons. Montgomery County has devoted significant resources to provide oral and written language assistance services to LEP individuals.

This document provides Ride On's 2020 Language Assistance Plan and includes:

1. Identification of LEP Individuals in Montgomery County Who Need Language Assistance
2. The Nature and Importance of Transit to LEP Individuals
3. Available Resources and Costs of Providing Language Assistance Services
4. Language assistance measures employed by Montgomery County
5. Planned language initiatives



## II. Identification of LEP Individuals Who Need Language Assistance

The United States Census' most recent American Community Survey (ACS) 5-year estimates (2013-2018) and 2018 one-year estimate offer current and reliable estimates of the number, proportion, and geographic distribution of LEP persons in the Ride On service area. This analysis of LEP individuals uses data estimates for the "county subdivision" census-defined areas (shown in Figure 1). The county subdivision geography was chosen because the estimates at this level provide the best balance between detail and statistical significance of the data.

According to the ACS 2018 one-year estimate, of the total Montgomery County population over the age of five (986,740), approximately 14.3% (140,833) speak English less than "very well". Spanish/Spanish Creole, Chinese, African languages, Korean, French (including Patois and Cajun) and Vietnamese, speakers make up the majority (approximately 80%) of the languages spoken at home among the subpopulation of people 5 years and over who speak English less than "very well." Table 1 shows the number and proportion of all languages spoken using the American Community Survey 2018 one-year data<sup>1</sup>.

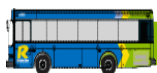
The Spanish speaking population has the largest number of persons (68,541) within the county who speak English less than "very well" with Chinese speakers having the second largest segment (16,836 persons) who speak English less than "very well."

Figure 1, shows that the highest concentrations of linguistically isolated households<sup>2</sup> are located in and around the Germantown/Gaithersburg area in the center of the county and the Wheaton-Glenmont/College Park area just north of Washington, D.C.

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<sup>1</sup> ACS 1 yr Table B08113: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER.

<sup>2</sup> households where no person age 14 or older in the household speaks English only or speaks English "very well".



**Figure 1: Percent Linguistically Isolated Households, Montgomery County**

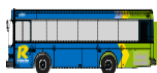
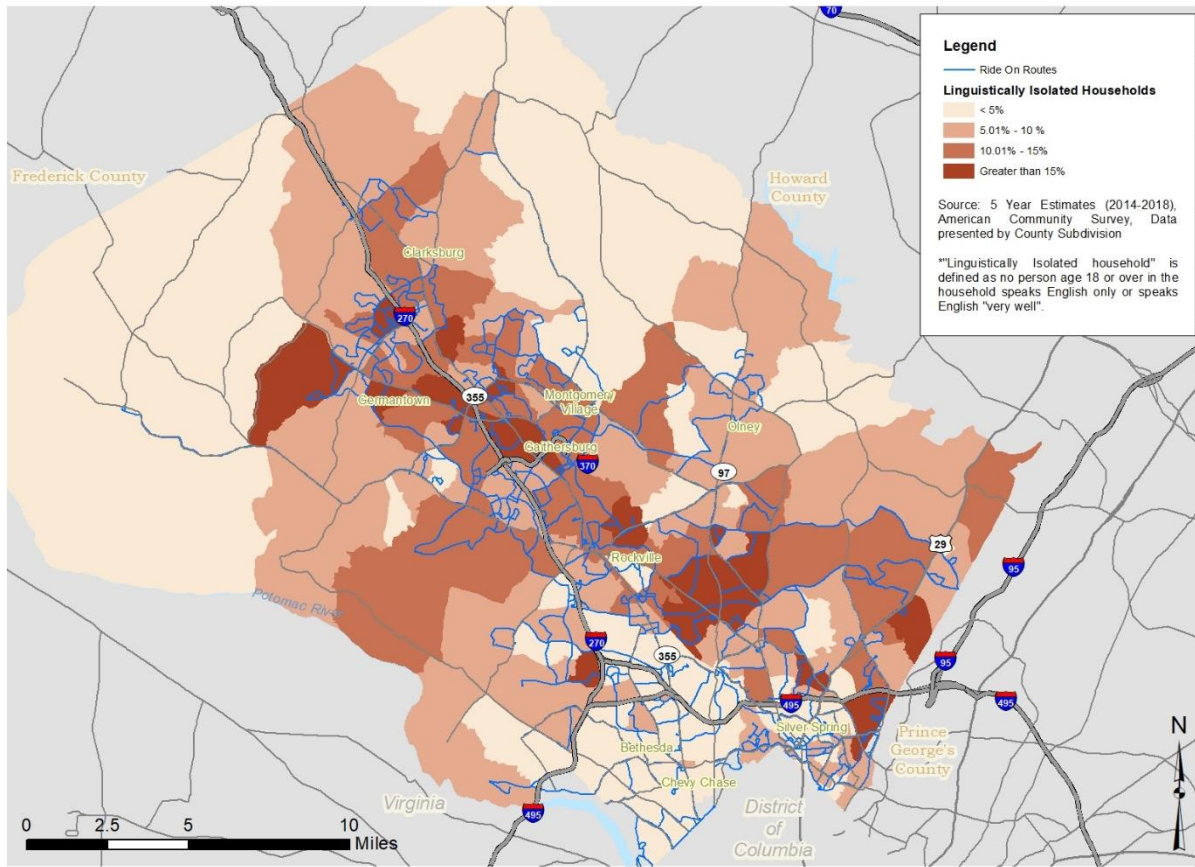


Table 1: Language Spoken at Home of Persons that Speak English Less than "Very Well" in Montgomery County (Population 5 Years and Over)

Montgomery County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish	68,541	6.9%	48.7%
Chinese (incl. Mandarin, Cantonese)	16,836	1.7%	12.0%
Amharic, Somali, or other Afro-Asiatic languages	6,881	0.7%	4.9%
Korean	6,131	0.6%	4.4%
French (Cajun)	5,602	0.6%	4.0%
Vietnamese	4,663	0.5%	3.3%
Russian	3,927	0.4%	2.8%
Portuguese	3,028	0.3%	2.2%
Bengali	2,518	0.3%	1.8%
Persian (incl. Farsi, Dari)	2,117	0.2%	1.5%
Tagalog (incl. Filipino)	2,030	0.2%	1.4%
Swahili or other languages of Central, Eastern, and Southern Africa	1,844	0.2%	1.3%
Nepali, Marathi, or other Indic languages	1,417	0.1%	1.0%
Urdu	1,274	0.1%	0.9%
Japanese	1,226	0.1%	0.9%
Yoruba, Twi, Igbo, or other languages of Western Africa	1,108	0.1%	0.8%
Haitian	1,037	0.1%	0.7%
Gujarati	1,009	0.1%	0.7%
Ilocano, Samoan, Hawaiian, or other Austronesian languages	1,006	0.1%	0.7%
Other Slavic languages	994	0.1%	0.7%
Hindi	979	0.1%	0.7%
Arabic	964	0.1%	0.7%
Other languages of Asia	951	0.1%	0.7%
Thai, Lao, or other Tai-Kadai languages	878	0.1%	0.6%
Tamil	576	0.1%	0.4%
Other and unspecified languages	551	0.1%	0.4%
Malayalam, Kannada, or other Dravidian languages	536	0.1%	0.4%
Other Indo-European languages	393	0.0%	0.3%
Telugu	370	0.0%	0.3%
Italian	333	0.0%	0.2%
Polish	250	0.0%	0.2%
German	235	0.0%	0.2%
Khmer	191	0.0%	0.1%
Punjabi	154	0.0%	0.1%
Serbo-Croatian	150	0.0%	0.1%
Armenian	104	0.0%	0.1%
Greek	29	0.0%	0.0%
<b>Total LEP Population</b>	<b>140,833</b>	<b>14.3%</b>	<b>100.00%</b>
<b>Total County Population</b>	<b>986,740</b>	<b>100.00%</b>	
Source: American Community Survey 2018 1-year estimate			





Using American Community Survey 5-year Estimates 2013 – 2018, Figures 2 – 7 (pages 6-8) help identify where the highest concentration of each of the top six languages of LEP persons (Spanish/Spanish Creole, Chinese, Korean, African languages, Vietnamese, and French (including Patois and Cajun)) are spoken. The figures show the percent of the population of each county subdivision that speaks the given language at home and speaks English less than “very well”. Those subdivisions shown in red have the greatest percentage of the population with limited English proficiency that speaks the given language. These figures give reasonable guidance regarding the areas likely to have higher language assistance needs and for which languages the assistance is needed; we can be confident that those county subdivisions shown in red tones have higher concentrations of the given LEP population than those county subdivisions in green, but the rankings among subdivisions that have closer percentages may not hold true in reality.<sup>3</sup>

#### FTA Safe Harbor Guidance:

“Safe harbor” for translation of written material

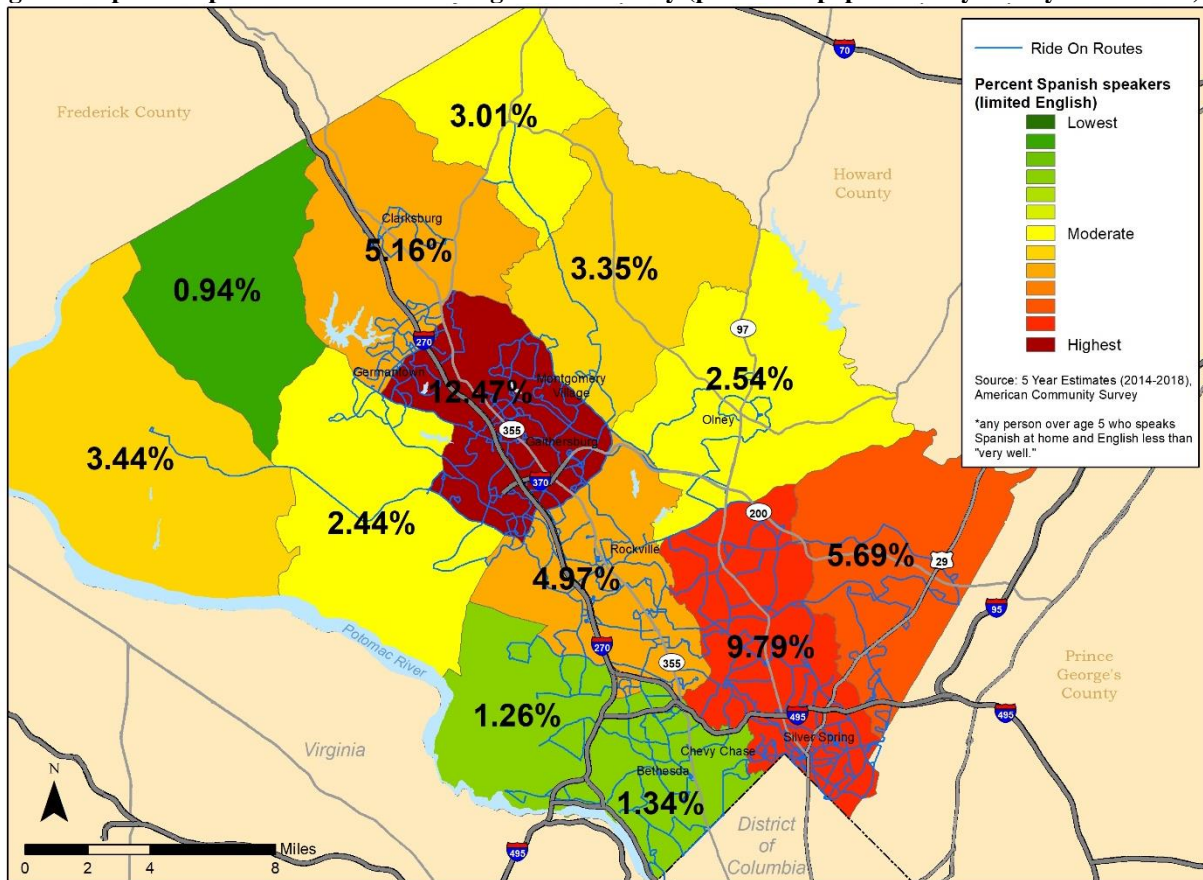
“Safe Harbor” stipulates if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations  
[https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Title\\_VI\\_Overview\\_4702.1B\\_11.05.12\\_ER.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Title_VI_Overview_4702.1B_11.05.12_ER.pdf)

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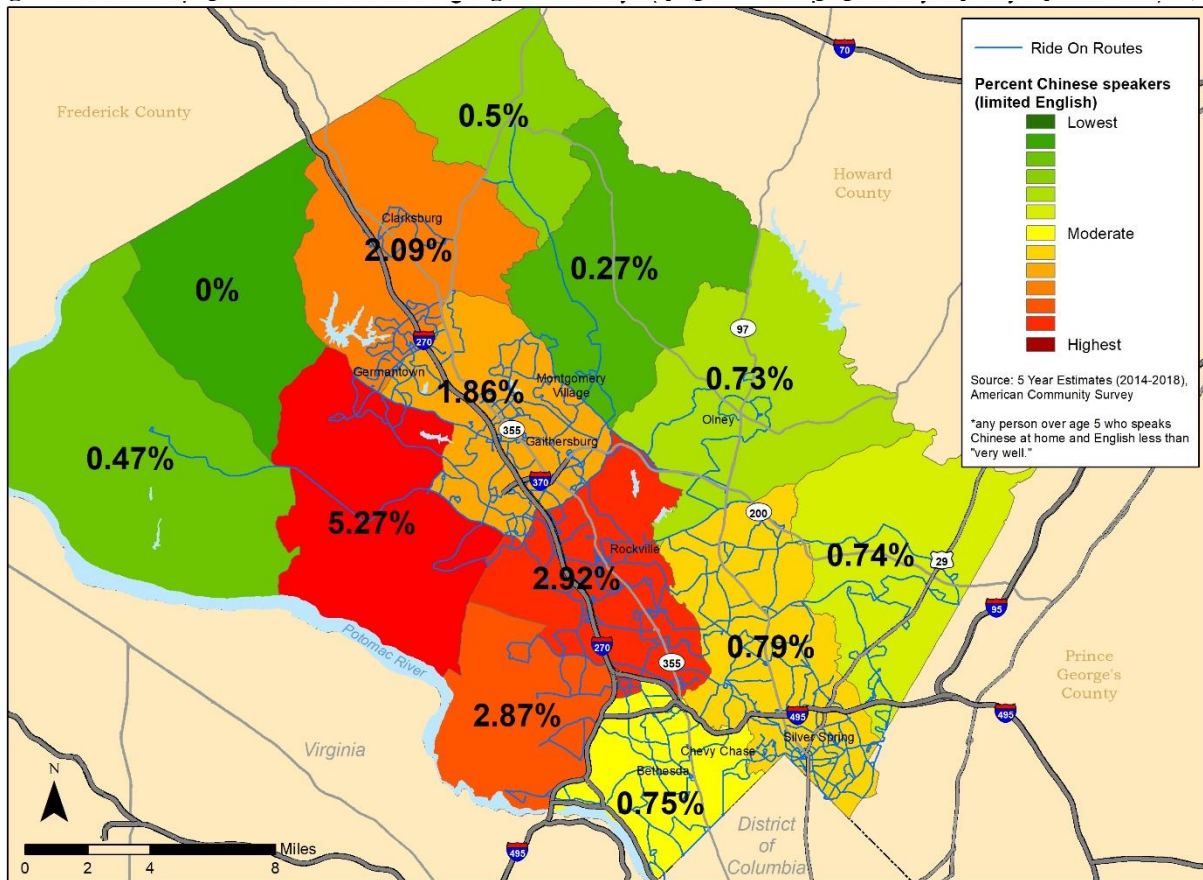
<sup>3</sup> Note regarding data limitations: This calculation deals with some sub-populations that are small and in some cases the estimates come with a significant margin of error; therefore, the percentages presented in Figures 2-7 can be considered good enough to identify the areas with highest percentages of LEP, non-English speakers, but percentages should not be used as concrete figures to compare with other data.



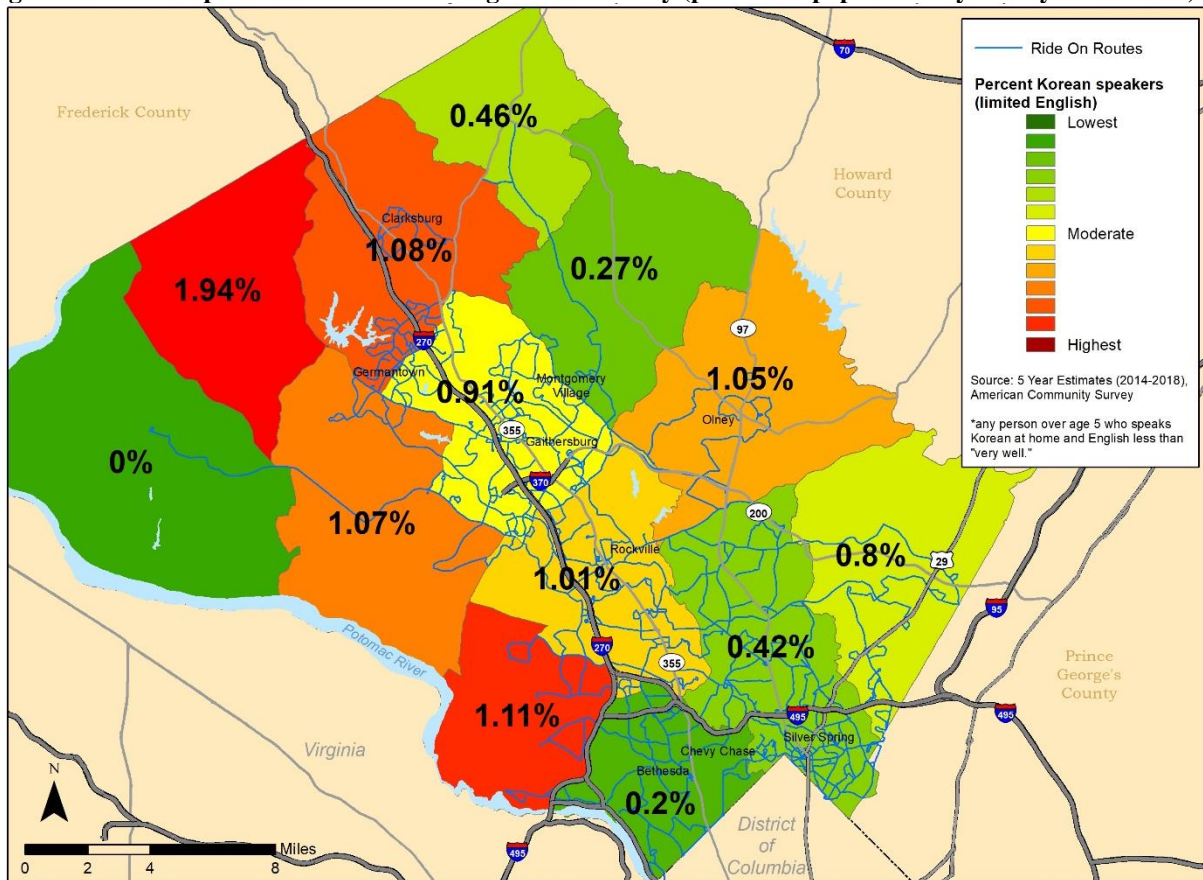
**Figure 2: Spanish Speakers with Limited English Proficiency (percent of population by county subdivision)**



**Figure 3: Chinese Speakers with Limited English Proficiency (percent of population by county subdivision)**

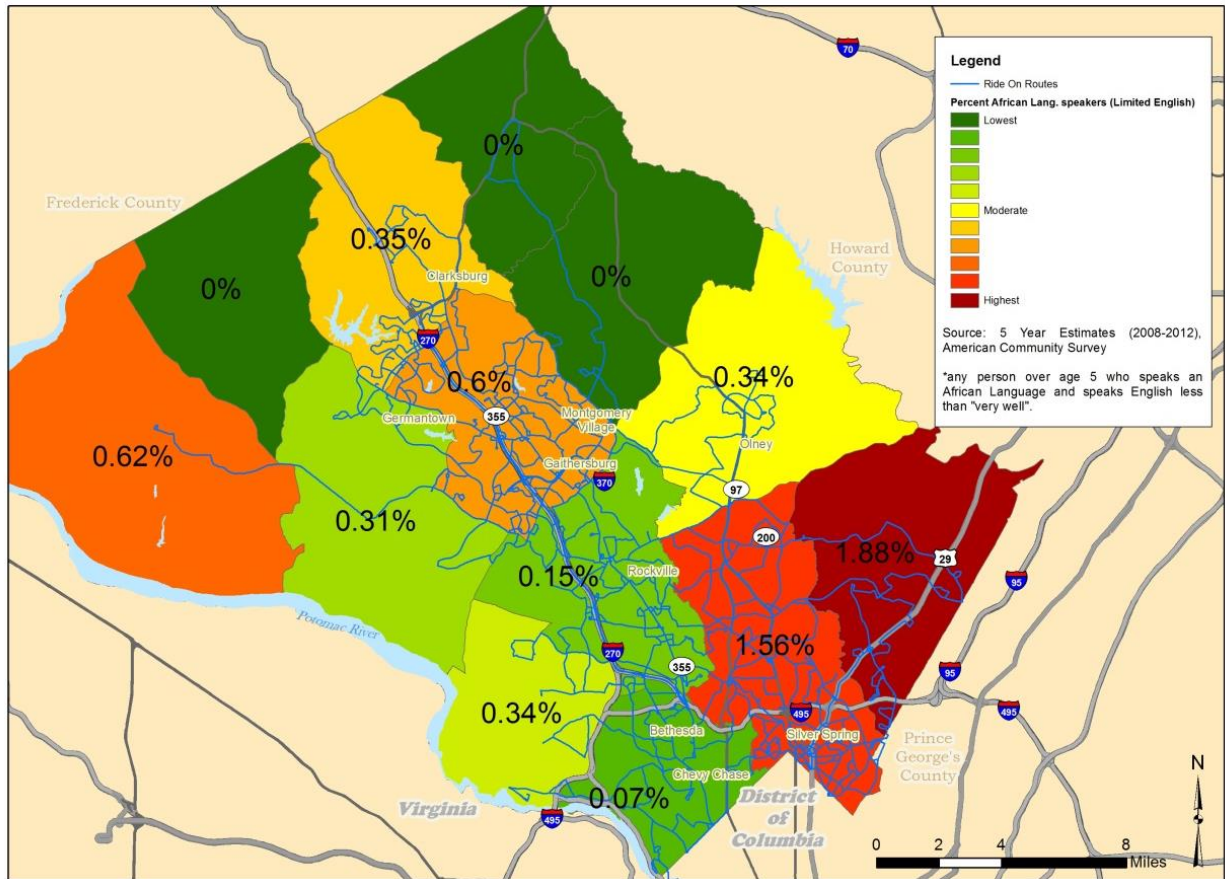


**Figure 4: Korean Speakers with Limited English Proficiency (percent of population by county subdivision)**

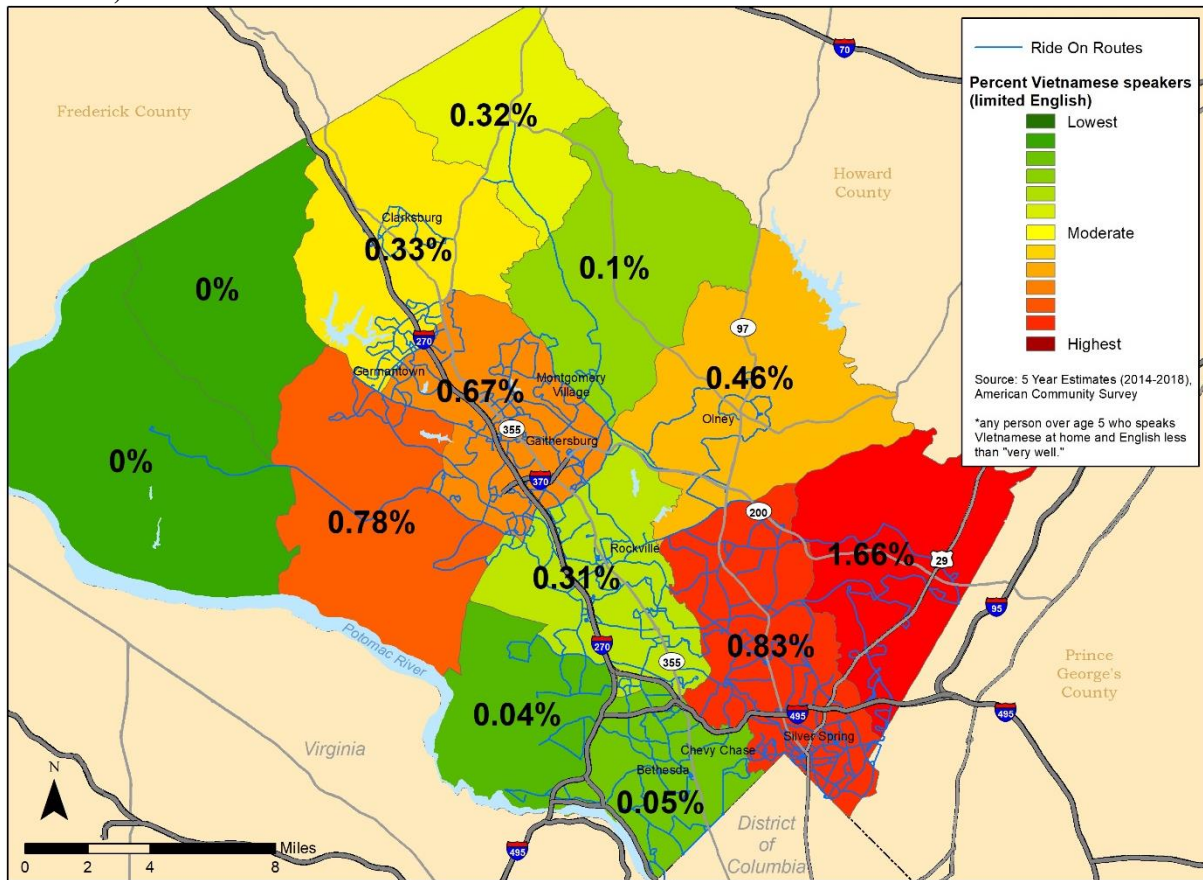




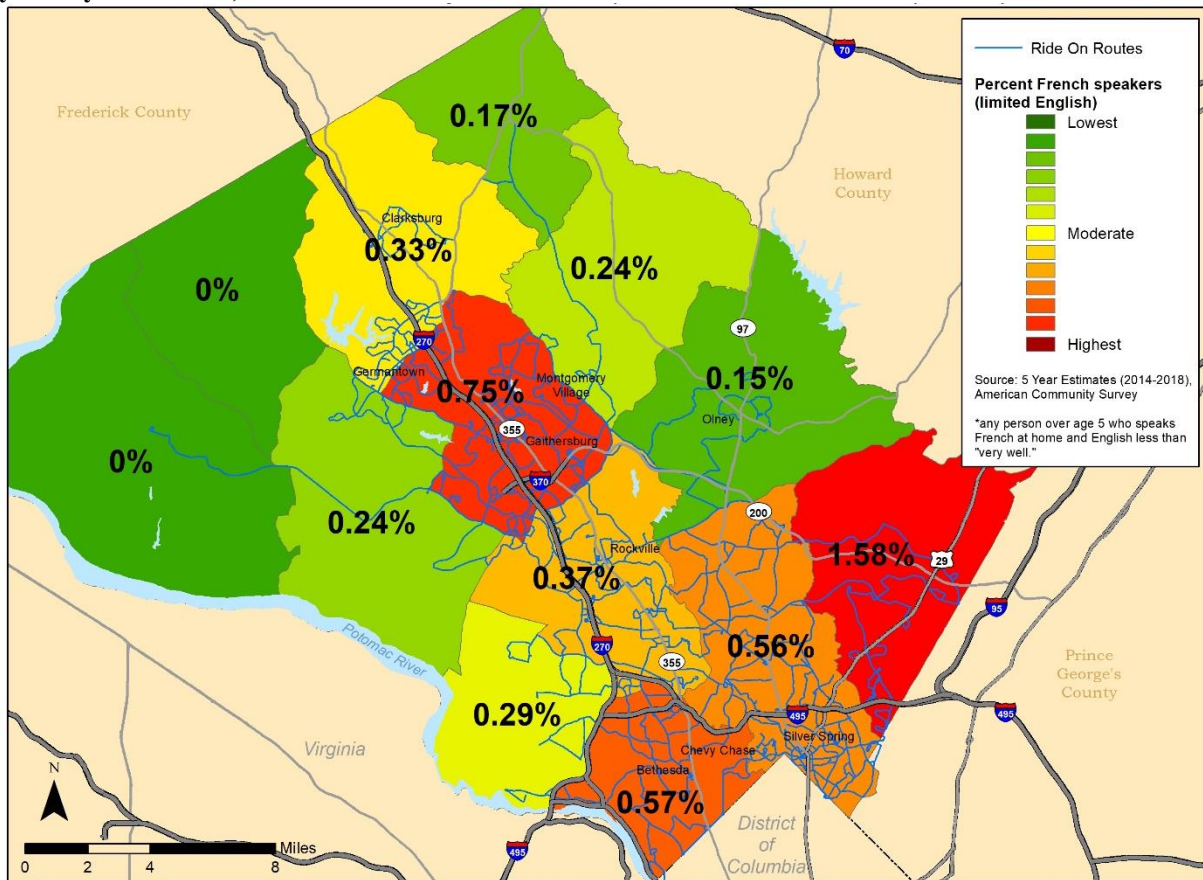
**Figure 5: African Language Speakers with Limited English Proficiency (percent of population by county subdivision)**



**Figure 6: Vietnamese Speakers with Limited English Proficiency (percent of population by county subdivision)**



**Figure 7: French Speakers (including Patois, Cajun) with Limited English Proficiency (percent of population by county subdivision)**



American Community Survey 2018 one-year estimates on workers 16 years and over is shown in Table 2.

**Table 2: Workers 16 years and Over**

	Workers	% of workers
Montgomery County	563,495	100.0%
Only English	316,487	56.2%
Spanish Speakers	100,463	17.8%
Other Languages	146,545	26.0%
Speak English less than "very well"	86,039	15.3%
Spanish Speakers less than "very well"	43,644	7.7%
Other Languages less than "very well"	42,395	7.5%
Source: ACS 2018 1-year Table BO8113		

Table 3 presents 2018 mode of transportation estimates. Of Montgomery County's estimated 563,495 workers 16 years and older, 13.4% use public transportation as the primary work trip mode.



**Table 3: Montgomery County Workers Mode of Transportation**

Workers	Workers	% of workers
Montgomery County	563,495	100.0%
Car, truck, or van - drove alone:	371,045	65.8%
Car, truck, or van - carpooled:	56,598	10.0%
Public transportation (excluding taxicab):	75,431	13.4%
Walked	12,708	2.3%
Taxicab, motorcycle, bicycle, or other means:	10,237	1.8%
Worked at home	37,476	6.7%
Source: ACS 2018 1-year Table BO8113		

### III. Frequency of Contact by LEP Persons with Ride On Services

#### ***a. Call Center – Requests for Interpretation***

The call center offers interpretation services through Spanish speaking customer service representatives who handled 962 service requests for FY20. Calls for other languages are referred to the Language Line which are tabulated by Montgomery County department for billing.

#### ***b. Website Data Translations***

The County currently is not able to identify web portal translation counts.

#### ***c. On-board Survey***

Ride On's 2018 on-board survey conducted from September through December 2018 asked customers questions about their language usage and skills. Nearly 10,900 riders participated in the survey; the data are summarized as follows:

- 42.7% of respondents report that they speak a language other than English at home. Languages spoken at home. Of the 2,454 responses listing a language spoken at home, the languages with more than 50 responses include Spanish 1,231, French 332, Amharic 170, Chinese 64 and Tagalog 54.
- 8.6% indicate that they read English “not well” or “not at all”
- 9.9% indicate that they speak English “not well” or “not at all”
- 10.6% of participants chose to take the survey in Spanish and 169 respondents chose to take the survey in one of the other languages offered (Chinese, Korean, Vietnamese, Amharic, French)

#### ***d. Montgomery County Ride On Reported Data***

Through regular employee meetings and interaction, Ride On management recognizes that interaction with non-english speaking riders is very frequent. Additional data has not been collected to quantify the frequency of contact.





## IV. Nature and Importance of Transit

While public transit is not an essential service, as are police, fire and medical emergency services, public transit is a key means of achieving mobility for many LEP persons.

Table 4 presents LEP characteristics for workers age 16 years and older who use public transportation as the primary work trip mode. Of the estimated 75,431 workers who use public transportation 16.4% speak English less than very well.

**Table 4: Montgomery County Workers Using Public Transportation LEP**

Workers 16 Years and Over	Workers	% of workers
Public Transportation	75,431	100.0%
Only English	44,038	58.4%
Spanish Speakers	13,878	18.4%
Other Languages	17,515	23.2%
Speak English less than very well	12,401	16.4%
Spanish Speakers - English less than very well	7,093	9.4%
Other Languages - English less than very well	5,308	7.0%
Source: ACS 2018 1-year Table BO8113		

## V. Available Resources & Costs of Providing Language Assistance Services

As noted in section VII, MCDOT maintains a variety of support services to LEP customers and residents. During fiscal year 2019, the Division of Transit Services spent \$1,838 for translating language assistance materials. Certified multilingual Division of Transit Services employees receive additional compensation which totaled \$225,366 in fiscal year 2019.



## VI. Language Assistance Measures Employed by Montgomery County

Montgomery County Ride On supports the goals of the DOT LEP Guidance to provide meaningful access to its services by LEP persons. The County Executive Order 046-10, effective March 2010, aims to enhance the quality and effectiveness of services for individuals with Limited English Proficiency in a variety of ways. County policy and employee guidelines for implementation are explained in the LEP Employee Handbook. Under its goals of inclusion and access, the County currently offers a number of language assistance services relative to the provision of transit services, including:

### Translation Services

- The Ride On web site ([www.montgomerycountymd.gov/DOT-transit/index.html](http://www.montgomerycountymd.gov/DOT-transit/index.html)) permits translation of Ride On schedules and other public materials into 82 different languages.
- The County has hundreds of employees that are certified in at least one other non-english language through the Multilingual Certification Program (see Training Initiatives, below) and available to provide translating services within or outside his/her primary department. As of May 2020, the Transit Services Division had 128 certified bilingual employees, 113 of whom were bus operators. The primary function of the certified employees within MCDOT is direct communication and minor interpretation or translation services. MCDOT uses their certified languages daily as part of their work with their users of public transportation, parking, and

### USDOT's LEP Guidance

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service; and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets. The intent of DOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

After completing the above four-factor analysis, recipients can determine the appropriate "mix" of LEP services required. Recipients have two main ways to provide language services: oral interpretation either in person or via telephone interpretation service and written translation. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis. For instance, a motor vehicle department or an emergency hazardous material cleanup team in a largely Hispanic neighborhood may need immediate oral interpreters available and decide to hire full-time bilingual staff. In contrast, there may be circumstances where the importance and nature of the activity and number or proportion and frequency of contact with LEP persons may be low and the costs and resources needed to provide language services may be high in which pre-arranged language services for the particular service may not be necessary. The languages spoken by the LEP individuals with whom the recipient has frequent contact often determine the languages into which documents will be translated and the types of interpreters provided.

<https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance>.



consumer questions to the Director's Office.

- The County's Language Bank of volunteers is available to help translate and interpret for County government agencies and registered nonprofit organizations serving residents with limited English proficiency. Language Bank volunteers serve as interpreters and translate documents for various agencies and organizations.
- Language ID boards at all service sites to help County staff identify which language the LEP person speaks.
- The MC311 Customer Service Center offers a single point of contact for information on County services and program and includes language interpretation service with over 150 languages available. After calling 311, press 1, for Spanish, or stay on the line to ask the next available customer service representative to request to conduct the call in the language of your choice. The service can be accessed through telephone and web-based channels and is made known through community outreach efforts, which include flyers/palm cards in multiple languages, meeting with community groups, and television/radio/newspaper advertisements in Spanish. During the period July 1, 2020 to June 12, 2020, there were 25,253 calls to the MC311 Spanish Line with 7,897 related to COVID19 and fiscal year 2020 calls
- The Passenger Bill of Rights and Responsibilities is provided in English and Spanish.
- MCDOT publishes a Resident User Guide in Chinese, Spanish, Korean and Vietnamese summarizing MCDOT programs including Ride On.

### **Public Outreach**

- A website dedicated to language access ([www.montgomerycountymd.gov/lep](http://www.montgomerycountymd.gov/lep))
- PSA videos in multiple languages to raise awareness about the availability of language assistance services.
- The Office of Community Partnerships employs a staff of over one dozen to carry out the County Executive's commitment to build a larger policy table with participation by a more diverse range and greater number of residents, particularly those from underserved and emerging communities. This program includes a network of contacts and community based resources that could help LEP persons navigate community resources, including transit use.

### **Training Initiatives**

- Multilingual Certification Program through the office of Human Resources encourages employee certification in one of the approved languages identified as the predominant languages used by county residents to enhance its ability to serve its LEP customers. There are hundreds of certified employees who can be called upon for services outside of their primary department.
- A three-hour training course for all frontline staff and those who may interact with LEP persons is mandatory.
- Community Interpreter training is a mandatory day-long training course for certified bilingual employees to learn the ethics and techniques of being a more effective interpreter.

### **Monitoring**

- An LEP leadership Team led by the Language Access Coordinator oversees countywide policies and practices on language access; LEP Department Liaisons designated by department directors are responsible for implementing the LEP policy for the Executive



Branch's departments, office, and programs. Each Department is responsible for maintaining an up to date Language Access Plan.

## **VII. Planned Language Assistance Initiatives**

The Montgomery County Department of Transportation created a Title VI compliant Language Assistance Plan (LAP) in June 2009. The LAP was updated in 2014, 2017 and 2020 and is intended to:

- 1) Ensure MCDOT's compliance with applicable federal and state laws and guidelines as well as the County's policy on providing meaningful access to people with limited English proficiency; and
- 2) Establish expectations, processes and accountability mechanisms for all units and employees within MCDOT that interact with individuals with LEP.

To those ends, MCDOT has identified the following actions to address potential access barriers faced by LEP customers as of 2020:

### **Translation of Vital Documents:**

- Continue the Ride On web site ([www.montgomerycountymd.gov/DOT-transit/index.html](http://www.montgomerycountymd.gov/DOT-transit/index.html)) which permits translation of Ride On schedules and other public materials into more than 100 different languages when using Google Chrome.
- Continue to print bilingual bus notices for fare changes, schedule changes and other policy changes.
- Continue to print and advertise notices for public forums in other languages.
- Continue to translate certain media releases.
- Continue to provide other language support through the conferencing telephone at the Transit Information window.
- Maintain greeting and other messages in Spanish on the main contact numbers.
- Continue to staff certain community events with bilingual staff.
- Advertise with other language media for certain programs, such as Give and Ride Residents Guide to Services, will continue to be printed in five languages.
- Continue to print and post the Non-discrimination poster on the interior of each vehicle operated in passenger service in English and Spanish
- Continue to provide on the Ride On web site the Ride On User Guide in English, Amharic, Chinese, French, Hindi, Korean, Spanish and Vietnamese.

### **Public Communications:**

- Continue the Ride On web site ([www.montgomerycountymd.gov/DOT-transit/index.html](http://www.montgomerycountymd.gov/DOT-transit/index.html)) which permits translation of Ride On schedules and other public materials into 82 different languages.
- Display language ID posters or boards at various DOT front desk areas and visitor's centers.
- Continue to print bilingual bus notices for fare changes, schedule changes and other policy changes.
- Continue to print and advertise notices for public transit forums in other languages.
- Continue to translate certain public transit media releases.
- Continue to provide other language support through the conferencing telephone at the Transit Information window.



- Record greeting messages on the main contact numbers in Spanish.
- Continue to use bilingual staff and bilingual materials at public events and community activities.
- Maintain greeting and other messages in Spanish on the main contact number.
- Continue to staff certain community events with bilingual staff.
- Advertise with other language media for certain programs such as Give and Ride.
- Locate bilingual staff member at DOT Customer Service desk to assist customers.
- As a result of COVID-19, MCDOT Division of Transit Services plans to use MS Teams in conjunction with our regular onsite public forums in the future. MS Teams will be an “option” for residents and interest parties to participate.

#### **Staff Training:**

- All frontline staff will continue to receive the 3-hour LEP training hosted by OHR. Managers and supervisors will receive a different version of training on language access requirements and cross-cultural competency to be designed by the Language Access Coordinator in conjunction with OHR.
- All staff with public interaction will receive additional hands-on training and written instruction on how to access and properly use language resources.
- The Department's Community Relations Manager will continue to attend the monthly Community Outreach Forum sponsored by the County Executive's Office of Community Partnerships. He/She will share relevant LEP information from this meeting with division chiefs, for transmittal to their staff as appropriate.
- MCDOT will invite the Language Access Coordinator to conduct an on-site LEP briefing so as to avoid waiting for too long to bring all frontline staff to speed.

#### **Internal and External Evaluation, Data Collection and Reporting:**

- Performance evaluation of frontline staff, their supervisors and directors will reflect their awareness and work (in the form of staff training) of LEP policy, requirements and quality of work.
- The number and nature of complaints as well as response time and level of satisfaction in resolution will all be part of data collection.

